

Subject: PRP Search Enforcement timeline for CES Environmental Services, Inc.-Houston

Date: 09/16/14

08/29/14

From TCEQ received names and addresses of approximately 200 entities. Named entities reported to TCEQ that, during 2009 and 2010, they had shipped, generated, and or arranged for shipments of hazardous and non-hazardous wastes to the CES Houston facility.

First wave – Combination 104(e) Information Requests & General Notice Letters

09/16/14 thru 10/10/14

19 work days

- Match TCEQ provided named entities with TCEQ's record of self-reported information from transporters, generators, and/or arrangers with self-reported 1-digit classifications coded "H" (H = hazardous per TX Waste Code).
- Obtain from TCEQ a list of names to match generator codes that appear on TCEQ's record of self-reported information from transporters, generators, and/or arrangers for years 2009 and 2010.
- Prepare combination 104(e) Information Requests / General Notice letters (COMBOL) for only those entities listed on TCEQ's record of self-reported information from transporters, generators, and/or arrangers with self-reported 1-digit classifications coded "H."
- Obtain concurrences in eRouting for COMBOL that will apply to all entities.
- Prepare and make ready first of possibly two AOCs.

10/14/14 thru 10/31/14

14 work days

- Issue COMBOLs (allow 15 day response time for GNL part of COMBOLs and 30 day response time with probability of 60 day response time for the 104(e) part of COMBOLs).

11/03/14 thru 11/07/14

5 work days

- Allowance for receipt of issued 104(e) letters and COMBOLs

11/10/14 thru 11/21/14

9 work days

- Planned period to receive COMBOL responses.

11/24/14 thru 02/20/15

60 work days

- Complete review of COMBOL responses.
- Negotiate with applicable PRPs.

02/23/15 thru 03/13/15

15 work days

- Obtain signatures on first of possibly two AOCs with initial group of PRPs agreeable to participate in the removal action.

Second Wave - Combination 104(e) Information Requests & General Notice Letters

09/16/14 thru 10/15/14

20 work days

- Contractor's Conversion of TIFF files on CDs to searchable PDF files.

10/16/14 thru 11/07/14

17 work days

- Redact CDs (business document collection)

- If necessary, modify already approved 104(e) Information Requests and COMBOLs future merging of named addressees.
- Review/search PDF files on CDs for “hazardous waste manifests,” and any other information that identify entities with potential designation as transporters/generators/arrangers.
- Identify entities that should receive only 104(e) Information Requests.
- Identify entities that should receive COMBOLs.
- Issue 104(e) letters (allow 30 day response time with probability of 60 day response time).
- Issue COMBOLs (allow 15 day response time for the GNL part of COMBOLs and 30 day response time with probability of 60 day response time for the 104(e) part of COMBOLs).

11/10/14 thru 11/14/17

4 work days

- Allowance for deliveries of issued 104(e) letters and COMBOLs.

12/15/14 thru 01/15/17

24 work days

- Planned period to receive 104(e) responses and COMBOL responses

01/16/15 – 04/13/15

60 work days

- Complete review of 104(e) responses and COMBOL responses.
- Negotiate with applicable PRPs.

04/14/15 thru 05/05/15

15 work days

- Potentially obtain signatures on second AOC with PRPs agreeable to participate in the removal action.
- Proposed timeline does not allow for possible Federal Register publication.
- Proposed timeline gives no consideration for an UAO.